

Dear FCC Commissioners & Staff:

The FCC's proposal to remove the requirement that ISPs be provided access to the RBOC's network is simply wrong and in no way meets the FCC's goal of ubiquitous broadband deployment. In fact it is the RBOCs themselves that are to blame for DSL broadband deployment delays, and if anything additional requirements should be made upon them, not less.

Over a decade ago, it was the small, independent Internet Service Providers such as the company that I helped found, IgLou, that took the first brave steps into the Internet industry. We, not the RBOCs took the initial risks. We, not the RBOCs are the ones who built the Internet into what it is today. We, not the RBOCs took ordinary voice telephone lines and turned them into the communications medium of the future. And, it is we, the independent ISPs, who still provide more than half of Americans with the Internet access they use to get online each and every day.

Next when it came time to deploy DSL, who was first to market? Who took the initial risks to deploy this now valuable piece of America's telecommunications infrastructure? Again it was the independent ISPs who took ordinary burglar alarm lines and just like the POTS lines before them, re-tooled them into a valuable piece of communications infrastructure. The RBOCs were too busy at the time trying to figure out this Internet thing in the first place and too busy protecting their valuable T1 lines to think about offering a new technology that might make high speed access affordable to millions of Americans. Once the RBOCs caught on to what the ISPs were able to do with these burglar alarm lines they quickly raised the fees on them to astronomical levels, made obtaining these lines nearly impossible, or obsoleted them from tariffs altogether.

Several years ago, the FCC made the wise choice of mandating that the RBOCs provide ISPs with wholesale access to DSL. The FCC saw that the ISPs were a vital link in the Nation's DSL food chain and ensured their access to necessary facilities. However, now the FCC seeks to reverse this decision. The ISPs are still out there struggling to deploy DSL despite the RBOCs best efforts to prevent them, and now the FCC wants to drop the gauntlet and destroy the entire industry that built the Internet we know today. What the hell is the FCC thinking?

It is most unfortunate that the FCC now views the regulations put in place to protect America from the abuses of absolute telecom monopolists as 'burdensome regulations.' The RBOCs are MONOPOLISTS. The Department of Justice has been spending the last several years proving that Microsoft is a monopoly, all the while the real monopolists, the RBOCs, were only perfecting their craft. Despite the best efforts of regulators at the State and Federal level, local telephone competition is NOT alive and well. If it were ISPs and consumers could simply vote with their dollars when a telephone company wronged them in any way. This simply is not an option for the vast majority of Americans when it comes to telephone service and it certainly is not an option for most ISPs when it comes to DSL.

Perhaps the dictionaries at the FCC were printed without an entry for competition. Just in case this is the situation, I have included a copy of it below.

com-pe-ti-tion: noun

1. the act or process of competing as the effort of two or more parties acting independently to secure the business of a third party by offering the most favorable terms.

True and meaningful competition in the dial-up Internet access marketplace is why most Americans have a choice of more than one ISP over a range of affordable prices, with a bevy of service offerings. The lack of meaningful competition in the DSL marketplace is why most Americans cannot afford the near \$50 price tag placed on broadband and why many Americans are unable to obtain it at all.

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Sincerely,

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